

DENNIS C. REICH, ESQ. (SBN #69631)
 Reich and Binstock, LLP
 4265 San Felipe, Suite 1000
 Houston, Texas 77027
 Tel: 713.622.7271
 Fax: 713.623.8724
 Email: dreich@reichandbinstock.com

Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

**MOTION TO WITHDRAW AS
 COUNSEL OF RECORD FOR
 PLAINTIFFS A.E., A.D., AND K.H.**

This Document Relates to:

A.E. v. Uber Technologies, et al., Inc., et al.;
3:25-cv-07668-CRB; and

A.D. v. Uber Technologies, et al., Inc., et al.;
3:25-cv-07091-CRB; and

K.H. v. Uber Technologies, et al., Inc., et al.;
3:25-cv-07700-CRB

Pursuant to Local Rule 11-5, Dennis R. Reich, of Reich & Binstock, LLP, counsel of record (“Counsel”) for the above-referenced Plaintiffs, respectfully moves this Court for an Order allowing his firm, Reich & Binstock, LLP, to withdraw as counsel of records for Plaintiffs A.E., A.D., and K.H., as explained below.

Prior to Defendants filing their show cause motion [ECF 4137], Counsel met and conferred with opposing counsel on Friday, October 10, 2025, to discuss Plaintiffs’ alleged “non-bona-fide receipts” that the Plaintiffs previously provided to Counsel. After reviewing the ride receipts with opposing counsel, Reich & Binstock, LLP, advised of their intention to withdraw as counsel of records should the above-mentioned Plaintiffs fail to provide additional ride receipt proof. Relying on opposing counsel’s representations asserted during the meet and confer,

1 Counsel's office immediately attempted to contact the above-referenced Plaintiffs via phone call
2 and email. Counsel informed the Plaintiffs of Defendant's concerns regarding the alleged "non-
3 bona-fide receipts," and requested additional proof of the respective rides at issue. Counsel further
4 attempted to contact Plaintiffs via phone call, email, and certified mail, requesting additional
5 proof of ride receipt by October 20, 2025, explaining that Plaintiffs' respective cases may be
6 dismissed and/or that Counsel would seek withdrawal as their attorneys. As required by Local
7 rule 11-5(a), Counsel has provided written notice of Counsel's intent to withdraw, reasonably in
8 advance, to the above-referenced Plaintiffs as well as notice to opposing parties.

9 At the time of this Motion to Withdraw, no additional ride receipt proof has been provided
10 by Plaintiffs, A.E., A.D., or K.H., nor has any substitute counsel been identified.

11 WHEREFORE, the attorneys and law firm, Reich & Binstock, LLP, respectfully request
12 that they be allowed to withdraw as counsel of records for Plaintiffs, A.E., A.D., and K.H. A
13 courtesy copy of this motion will be served upon Plaintiffs at their last known address and via
14 electronic mail.

15 Dated: October 27, 2025

Respectfully submitted,

16 By: /s/ Dennis C. Reich
17 DENNIS C. REICH (SBN #69631)
18 Reich & Binstock, LLP
19 4265 San Felipe, Suite 1000
20 Houston, Texas 77027
21 Tel: 713.622.7271
22 Fax: 713.623.8724
23 Email: dreich@reichandbinstock.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2025, I electronically transmitted the foregoing Motion to Withdraw as Counsel of Record to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendant's counsel via email at: ubermdlservice@listserv.shb.com

/s/ Dennis R. Reich
Dennis R. Reich